

May 31, 2019

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street S.W.
Room TW-A325
Washington, DC 20554

Re: Notice of *Ex Parte* Presentations
CG Docket Nos. 02-278, 17-59, 18-152; WC Docket No. 17-97

Dear Ms. Dortch:

On May 30, 2019, on behalf of the American Association of Healthcare Administrative Management, I spoke by telephone with Arielle Roth, Wireline Advisor to Commissioner Michael O'Rielly; and separately with Michael Scurato, Legal Advisor to Commissioner Geoffrey Starks.

During the discussions, I expressed support for the Commission's efforts to address illegal automated calls. I also raised concerns that, under the draft call blocking *Declaratory Ruling*¹ currently scheduled for the Commission's vote on June 6, 2019, healthcare communications, among others, could be inadvertently blocked.

I urged the Commission to seek comment on the proposals in the draft *Declaratory Ruling* by recasting the *Declaratory Ruling* as a *Notice of Proposed Rulemaking*. In addition, and as part of any effort to seek comment, the Commission should clarify that the proposals would only apply to the blocking of illegal calls. The Commission should also propose that there be sufficient notice of blocking to the caller and to the call recipient, and propose to provide a mechanism for the unblocking of any erroneously blocked numbers.

Pursuant to Section 1.1206(b)(2) of the Commission's rules, this letter is being filed electronically with your office. Please contact me with any questions.

Respectfully submitted,

/s/ Mark W. Brennan

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¹ *Advanced Methods to Target and Eliminate Unlawful Robocalls*, Draft Declaratory Ruling and Third Further Notice of Proposed Rulemaking, CG Docket No. 17-59, WC Docket No. 17-97, FCC-CIRC1906-01 (May 16, 2019) (*Draft Declaratory Ruling*).